



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 9, 2023

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Cabral et al.*, 22 Cr. 366 (JPC)

Dear Judge Cronan:

The Government respectfully writes to request an approximately 60-day adjournment of the parties' respective deadlines to make expert disclosures in the above-referenced matter.

Currently, the Government's expert disclosures are due July 10, 2023; the defendants' expert disclosures are due August 14, 2023; and trial is set for February 26, 2024. The parties, however, are actively engaged in discussions regarding potential pretrial resolution of this matter. According, the Government respectfully requests, with the consent of counsel for defendants Teo Cabral and Biana Burgos-Munoz,¹ that the parties' expert disclosure deadlines each be adjourned approximately 60 days. Given that the disclosures would still be made well in advance of trial, the Government respectfully submits that the requested adjournment will not prejudice any party, nor unduly delay resolution of this matter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Jonathan L. Bodansky
Brandon D. Harper
Assistant United States Attorneys
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¹ The Government has not yet had an opportunity to speak with counsel for defendant Philome Duverne concerning this request.

The request is granted subject to any opposition from Defendant Duverne. Duverne should indicate any opposition to the request by July 10, 2023, at 5:00 p.m. in which case the Court may reconsider the request.

SO ORDERED.

July 10, 2023
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN
United States District Judge